IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

MBMK PROPERTY HOLDINGS, LLC,

Debtor

CHAPTER 11

Bankruptcy No. 2:22-bk-13121 (MDC)

MBMK PROPERTY HOLDINGS, LLC,

Plaintiff,

v.

WILMINGTON TRUST, NATIONAL ASSOCIATION, As Trustee, For The Benefit of The Holders Of Corevest American Finance 2018-2 Trust Mortgage Pass-Through Certificates;

BAY MANAGEMENT GROUP OF PHILADELPHIA, LLC;

JAMES PAUL, d/b/a James Paul the ALPS Group;

and

ALPS GROUP, INC. d/b/a James Paul the ALPS Group,

Defendants.

Adversary Proceeding No. 23-00062 (MDC)

DEFENDANT ALPS GROUP, INC'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR RECONSIDERATION AND RELIEF FROM ORDER DENYING PRELIMINARY INJUNCTION FOR EQUITABLE ACCOUNTING

Now comes the Defendant ALPS Group, Inc., wrongfully sued as ALPS Group, Inc., d/b/a James Paul the ALPS Group, ("ALPS"), by its Attorney Alan I. Ehrenberg, of the Law firm of

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Alan I. Ehrenberg, LLC, appearing pro hac vice in this matter, and in response in opposition to

Plaintiff's Motion for Reconsideration and Relief From Order Denying Preliminary Injunction and

Equitable Accounting, states as follows:

ALPS hereby adopts each and every argument made by James Paul in James Paul's Response to

Plaintiff's Motion for Reconsideration and Relief from Order Denying Preliminary Injunction and

Equitable Accounting as though full set forth herein.

WHEFORE, ALPS respectfully requests that Plaintiff's Motion for Reconsideration and Relief from

Order Denying Preliminary Injunction and Equitable Accounting be denied with prejudice.

Respectively Submitted,

ALPS Group, Inc., d/b/a James

By: /s/Alan I. Ehrenberg

Appearing pro hac vice

Alan I. Ehrenberg, LLC

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